## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA \*

v. \* Criminal No. WDQ-13-0035

KAREN KIMBLE \*

\* \* \* \* \* \* \* \* \* \* \*

## MOTION TO WITHDRAW / CONDUCT ATTORNEY INQUIRY HEARING

Karen Kimble, by and through counsel, C. Justin Brown, hereby moves this Honorable Court to conduct an attorney inquiry hearing and allow her counsel to withdraw from this case. In support of this Motion, counsel states the following:

- 1. Kimble is charged in a 21-count indictment with wire fraud, subscribing to a false tax return, aiding in the filing of a false tax return, aggravated identity theft and visa application fraud.
- Undersigned counsel was appointed to represent Kimble pursuant to the Criminal Justice Act.
- 3. Kimble has indicated that she wishes to go to trial in this case. The trial, anticipated to last approximately two weeks, is currently set for July 1, 2013. Undersigned counsel has filed a motion to postpone the trial date, which is pending.
- 4. Kimble has indicated that she wishes for counsel to withdraw from the case so that she can receive another CJA attorney.

5. It is the belief of undersigned counsel that Kimble's request may be appropriately considered during an *ex parte* attorney inquiry hearing. At that time it is expected that Kimble will articulate the specific reasons for her request.

WHEREFORE, for the reasons described above, counsel respectfully requests that this Honorable Court grant this Motion, order an attorney inquiry hearing, and allow counsel to withdraw.

Respectfully submitted,

/s/

C. Justin Brown The Law Office of C. Justin Brown 231 E. Baltimore St., Suite 1102 Baltimore, MD 21202

Tel: (410) 244-5444 Fax: (410) 934-3208

## **CERTIFICATE OF SERVICE**

I hereby certify that on this day, May 8, 2013, a copy of the foregoing was served on all of the parties in this case via ECF.

\_\_\_\_\_\_/s/ C. Justin Brown

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	v.					*	Crir	ninal N	lo. WD	Q-13-0	)035
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	It is	hereby	ORDI	ERED 1	that C.	Justin l	Brown	be perr	nitted t	o with	drav
fron	n furthe	er repre	sentati	on of tl	ne Defe	endant i	in this 1	matter.			
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